IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant:	Carol ANN et al.	Examiner:	NGUYEN, Tan D
Serial No.:	09/887781	Group Art Unit:	3689
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Title:	METHOD AND SYSTEM USING AN ENTERPRISE FRAMEWORK		

CERTIFICATE OF TRANSMISSION
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APPELLANTS' BRIEF ON APPEAL UNDER 37 CFR 41.37

Mail Stop Appeal Brief - Patents
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Dear Sir:

This Brief is presented in support of the Notice of Appeal filed herewith from at least a second rejection of claims 1, 2, 4, 6, 9, 10, 13-23, 26, 27, 29 and 30 of the above-identified application, as set forth in the Office Action mailed 28 June 2010.

Appellants request that the fees charged for Appellants' Appeal Brief be charged to Deposit Account No. 09-0457. If other fees are required, please charge Deposit Account No. 09-0457 to cover any additional fees that may be required for filing this Brief.

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I. REAL PARTY IN INTEREST

The inventors assigned all their rights, title and interest to International Business Machines Corporation, Armonk, New York, which assignment was recorded 12 October 2001, Reel 012271, Frame 0749. International Business Machines Corporation is the real party in interest.

II. RELATED APPEALS AND INTERFERENCES

There are no appeals and interferences known to the Appellants which may be related to, directly affect or be directly affected by or having a bearing on the Board's decision in the pending appeal.

III. STATUS OF CLAIMS

Claims 1, 2, 4, 6, 9, 10, 13-23, 26, 27, 29 and 30 are pending, rejected and are the subject of this appeal. Claims 3, 5, 7, 8, 11, 12, 24-25, and 28 are canceled.

IV. STATUS OF AMENDMENTS

No amendments have been filed subsequent to the final rejection on 28 June 2010.

V.   SUMMARY OF THE CLAIMED SUBJECT MATTER

In independent claim 1, Appellants set forth a computer system illustrated in FIG. 4 of the originally filed application. The computer system has a computer processing unit and a coupled memory inherent in the enterprise-wide framework, i.e., computer system illustrated in FIG. 4. The computer system further comprises an integrated enterprise component 70 in FIG. 3 comprising a business component shown as 72 in FIGS. 3 and 5 and an information technology (IT) component shown as 74 in FIGS. 3 and 5. "Component" in the context herein refers to pieces of software code that are reusable by a number of software processes and that encapsulate both data structures and the algorithms applied to the data structures, *Applicants' Amendment and Response under 37 CFR 1.116* transmitted 11 August, page 13. The computer system also has an assessment component that assesses the impact on the business section components resulting from changes in the IT section components and vice versa, i.e., changes in the IT sections components resulting from changes in the business section components. In this way, a business is able to evaluate the impact of changes in the various section components before changes to the business or to the IT infrastructure are actually implemented, see page 4, line 18 through page 15, line 4 of the original specification.

The integrated enterprise component has a business component 72 having a plurality business section components shown in FIG. 5 and set forth in the original specification at page 12, lines 4-14: business structure section 310, organization units section 312, roles and responsibilities section 314, events section 315, processes section 316, features and functions section 318, business information section 319, and locations section 320 that are operationally integrated in the computer system. The sections interact with each other and with section components in the IT component.

The IT component 74 has a plurality of IT section components shown in FIG. 5 and set forth in the original specification at page 12, line 15 through page 13, line 9: application

software section 330, data section 332, user groups section 334, products and standards section 336, enterprise technology framework section 340, current IT environment section 342, reference architectures section 346, and delivery environments section 348. The IT section components interact with each other and with other business section components.

The computer system further has a guiding component user interface 240 in FIG. 4 described in the original specification at page 11, lines 10-15 to assist the user in navigating through the enterprise architecture 70. The computer system further comprises an assessment component represented by the lines of influence in FIGS. 4 and 5 and an impact assessment work product generator component (feedback system 244), described in the original specification at page 4, line 18 through page 5, line 11 and at page 11, lines 10-15. *See also* the architecture domain 107 described in column 4, lines 16-31 and the business domain 109 described in column 4, lines 32-44 and the work product descriptions 112 discussed in column 4, lines 16-44 and shown in FIG. 1 of US Patent 6950802 B1 entitled SYSTEM AND METHOD FOR SYSTEMS INTEGRATION to Barnes et al. (herein Barnes '802), having the same assignee as this application on appeal herein, and having been incorporated by reference in its entirety in the original specification at page 2, lines 5-7.

Dependent claim 2 further claims a governance component 120 described in the original specification at page 10, lines 6-8. Dependent claim 4 has a software navigator 240 described in the original specification at page 11, lines 10-15. Dependent claim 6 states that the enterprise component of claim 1 further comprises strategic direction 302, capabilities 304, and principles 306 components as described on page 11, lines 4-9. Claim 18 is dependent upon claim 6 and as described on page 10, lines 9-13, sets forth an organization component 130 of the structure of the business and information technology processing system, a business roles and responsibilities section component of members of the business enterprise, inventory of skills, education and training of members of the business enterprise, policies and practices section component. Dependent claim 19 further comprises a business/information technology alignment 140 component and a principles component as set forth in the original specification at page 11, lines 5-7. Claim 21, also dependent upon

claim 19, sets forth a plans component described in the original specification at page 10, lines 22-23. Dependent claim 22 has a user group component 334 component described in the original specification at page 11, lines 1-3. Dependent claim 23 has a products section 190 described in the original specification at page 11, lines 7-8. Dependent claim 26 comprises a business information component 250 described in the specification at page 11, lines 16-17. The reference architecture section component 260 of dependent claim 27 is described in the original specification at page 11, lines 18-19. Dependent claim 29 comprises a delivery environment section component 348, a data storage system section component 332 and a data implementation system section component 320 as described in the original specification at page 12, lines 15-22.

Independent claim 9 sets forth a method of integrating a business architecture with an information technology architecture in a computer processing system using digital representations in an interactive database "such as Lotus Notes and includes a simple navigator which allows for the easy use and modification of any of the components of the framework to reflect changes to the business, its capabilities and offerings", original specification at page 4, line 18 through page 5, line 4. Support for the computer-implemented method is given in the Barnes '801 patent, incorporated by reference as above. Claim 9 claims the interactive connections and integrations shown in FIG. 5 and is described in the original specification at page 11, line 20 through page 13, line 8; an enterprise directions component 302, an enterprise capabilities component 304, and an enterprise principles component 306 are coupled and integrated with the business component 72 and the IT component 74. The enterprise directions component 302 is coupled with the enterprise capabilities component 304; the business information section component 319, the business processes section component 316 and the business data section component 332 are integrated in the business component 72; and the business processes section component 316 and the enterprise capabilities component 304 are operationally coupled. Application software 330 and an information technology data section component 332 are integrated in the information

technology component, the application software 330 is coupled to the business processes section component 316 and the enterprise principles component 306. The method of independent claim 9 further **assesses the impact upon and determines the changes of the business component resulting from changes to the information technology component prior to implementing changes in the information technology architecture and vice versa as set forth in FIG. 5** and described in the original specification at page 4, line 18 through page 5, line 4 and page 13, lines 9-21. An impact assessment work product 112 is output as described in Barnes '802 at FIG. 1 and column 4, lines 16-44.

Dependent claims 10, 14-17 further elaborate on additional operational couplings and linkages between section components of the information technology component and the section components of business component as shown in FIG. 5, as well as customizing the reference information technology section components to a particular instance, industry, enterprise as set forth in the original specification at page 5, lines 12-16, page 9, lines 15-23.

Independent claim 30 presents an enterprise system set forth in FIGS. 3, 4 and 5 and details the operational integration of the various components as set forth in the original specification at page 10, line 1 through page 13, line 21. The enterprise system has a computer processing unit operatively coupled to and accessible to at least one memory, all of which are inherent in a computer system and disclosed in Barnes '802, incorporated by reference as above. The stored database is presented in the original specification at page 4, line 18 through page 5, line 4 and has a first business component portion 72 and a second information technology component portion 74 operationally integrated within. The first business component portion 72 comprises business operations and objectives of the business enterprise 140; the second information technology component 74 portion may comprise the information technology processing system 334, 340, 342, 348 and the application software 330 to process business information which the business enterprise uses to conduct its business. The enterprise system further comprises a governance function component 120, 350 comprising the objectives of the business enterprise system. The enterprise system also

has a navigator 240 for using and modifying the first business 72 and the second information technology 74 component portions. The enterprise system further comprises strategic direction 302, capabilities 304, and principles 306 components operationally integrated with the database; and an enterprise 130 component is described in the original specification at page 10, lines 9-14 as operationally integrated in the database and comprising a digital representation of an enterprise structure of the business enterprise, the information technology processing system, the roles and responsibilities of members of the business enterprise, an inventory of skills, education and training of members of the business enterprise, the policies and practices of the business enterprise, and enterprise structures. The enterprise system of independent claim 30 further has a business information technology alignment 140 component having a digital representation of strategies for business operations and the information technology processing system, set forth in the original specification at page 10, lines 15-16. An enterprise 160 component has a digital representation of capabilities of the business operations and the information technology processing system as described in the original specification at page 10, lines 20-21. A plans component 170 is also operationally integrated in the database of the data processing system and described in the original specification at page 10, lines 22-23 as representing business plans, information technology plans, projects, transitions, and enterprise and change plans. A users groups 170, 334 component is described in the original specification at page 11, lines 1-3 as comprising a digital representation of at least one user group and how the at least one user group affects the business enterprise. The enterprise system's database also has a products component 190 and a standards component 200 in the database operationally linked to an architectural building block integrated in the database as set forth in the original specification at page 11, lines 4-9. A principles component 220 is linked in the database to an enterprise component 160, the architectural building blocks component 210, and a business information technology alignment component 140. The principles component 220 comprises a digital representation of each of a plurality of principles and their respective application in operations of the

business enterprise and information technology processing system as described in the original specification at page 11, lines 10-15.

The enterprise system of independent claim 30 further comprises a business component 250 described in the original specification at page 12, lines 15-22, and is operationally integrated in the database wherein the business component comprises a digital representation of business areas and units, unit plans, business locations, processes and activities and needs of operations of the business enterprise and information technology processing system, as well as a reference component 260. The reference component 260 is described in the original specification at page 12, lines 15-22 as comprising reference components and models of reference business plans customizable for the business enterprise and information technology processing system; a business locations component 320 is described in the original specification at page 12, lines 15-22 as comprising a list of business locations of the business enterprise and information technology processing system; a delivery environment component 340 is described in the original specification at page 12, lines 15-22 as being linked to application software, data storage systems, data implementation systems within the business locations component, and to the products component and the standards component, respectively. The plurality of operational linkages among the components in the database are represented as the interactive double-arrowed linkages of FIGS 4 and 5. The linkage assessment tool 244, 247 of the enterprise system evaluates the operational linkages between the components integrated in the database and assesses the impact of changes to one or more of the business components integrated in the database resulting from changes on at least one other information technology component integrated in the database and vice versa and outputs an impact assessment work product, as described in the original specification at page 13, lines 9-21.

VI.   GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

A.   Whether independent claims 1, 9 and 30 are unpatentable under 35 U.S.C. §103(a) over U.S. Patent 7162427 to Myrick et al. (Myrick '427), in view of U.S. Patent 6151582 to Huang et al. (Huang '582).

VII. ARGUMENT

The legal foundation for the arguments follows. A prima facie case of obviousness requires that the prior art references, when combined, must teach or suggest all the claim limitations. In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). Obviousness cannot be sustained if there is no reasonable expectation of success in the alleged combination or modification. In re Merck & Co., 800 F.2d 1091, 231 USPQ 375 (Fed Cir. 1986). Rebuttal of a prima facie case of obviousness, moreover, is merely a showing of facts supporting the opposite conclusion. In re Heidt, 433 F.2d 808, 811, 167 USPQ 676, 678 (CCPA 1970) cited in In re Piasecki, 745 F.2d 1468, 223 USPQ 785 (Fed. Cir. 1984).

Rejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness. KSR International Co. v. Teleflex, Inc., 550 U.S. 398, 82 USPQ.2d 1385 (2007) citing In re Kahn, 441F.3d 997, 998 (Fed. Cir. 2006). A factfinder should be aware, of course, of the distortion caused by hindsight bias and must be cautious of argument reliant upon ex post reasoning. Id.

If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious. In re Fine , 837 F.2d 1071, 5 USPQ.2d 1596 (Fed. Cir 1988). Appellants address the rejections of the independent claims 1, 9, and 30.

A.   Claims 1, 9 and 30 are not obvious over Myrick '427 in view of Huang '582.

Appellants assert that the final rejection of claims 1, 2, 4, 6, 18-19, 21-23, 26-27, 29, 9-10, 13-27 and 30 as being obvious over U.S. Patent 7162427 to Myrick et al. (Myrick '427) in view of U.S. 6151582 to Huang et al. (Huang '582) is in error because the alleged combination of references do not teach all the claim limitations. The combination of Myrick '427 with Huang '582 does not teach assessment of the impact to the information technology components resulting from changes to the business component in an enterprise system, as required by independent claim 1, independent claim 9, and independent claim 30.

The rejection fails to present a prima facie case of obviousness because the combination of the references or the modification of Myrick '427 with the teachings of Huang '582 would not yield the claimed invention. Appellants claim a comprehensive integrated business/IT enterprise data processing system and a method whereby the effects of changes in one or more subsystems of the operationally integrated system on others of the subsystems are assessed and output before the actual changes are implemented. The final rejection at page 6, lines 3-4 admits that Myrick '427 does not teach a guiding component user interface to access and change one or more of the section components; the final rejection further admits that Myrick '427 does not teach an assessment component to assess how a change in one section component effects the relationships with others of the section components; and lastly, the final rejection also admits that Myrick '427 does not teach an impact assessment work product to generate a work product that outputs the results of the assessment component. With respect to Huang '582, the final rejection at page 8, lines 16-17, admits that Huang '582 does not assess the changes of an IT system resulting from changes in a business system.

The rejection surmises, however, that it would be obvious to a person having ordinary skill in the art at the time of the invention to modify the type of sub-business component system and method of Huang '582 to an information technology component as taught by Myrick '427 as merely using another well known sub-business component to determine the impacts/effects of various business scenarios or decision as a whole, both currently and into the near future the support managers in making decisions.

Myrick '427 teaches a framework tower of a plurality of planes representing an enterprise architecture including a strategic plan, a business architecture, an information architecture, an application architecture, a technology infrastructure architecture and an enterprise information technology management framework. Each architecture in the framework tower addresses the people, the processes, and technology of the enterprise so

that planning, definition, and solutions of an IT infrastructure can be performed and delivered to the business.

Huang '582 teaches a decision support system for managing a business enterprise having a supply chain that includes a plurality of nodes for supplier and supplier plant information, production, manufacturing and warehouse information, inventory, customer and demand, products and customer profiling and capacity, supply chains and transportation factors. Huang '582 teaches the details and complex equations addressing demands, inventory, sales forecasts, supply management, repair management, etc. In fact, the business quantitative models and data analysis routines taught by Huang '582 are so exacting that one of ordinary skill in the art of information technology would not be inclined to look Huang '582 to assess changes in an IT system resulting from changes in the business system. In other words, the equations and teachings of Huang '582 are not applicable to an IT system of a business enterprise. As realized in the rejection, moreover, Huang '582 does not teach or suggest how a change in an information technology architecture or component integrated with the business system affects the other, as required by independent claims 1, 9, and 30.

Appellants assert further that like Huang '582, Myrick '427 also does not assess the impact of changes in the IT system on the business system. Both Huang '582 and Myrick '427 are one-sided. Huang '582 assesses only the impact of a business component upon another business component; Huang '582 does not consider any impacts of changes of an IT component. Myrick '427, on the other hand, presumes that the business components are fixed and assesses only the impact of fixed business components to generate a model of an IT infrastructure. Myrick '427 teaches only how to develop a strategic IT plan and consequently build IT solutions for a business whose components are fixed, *see* Myrick '427 at column 37, lines 47-65. In fact, neither reference teaches assessing changes to an IT system when the business system changes and assessing changes to a business system resulting from changes to the IT system – so their combination cannot. Neither considers the impact of changes in the IT infrastructure on the business architecture, as required by claims 1, 9, and 30. Claims

must be read as a whole, <u>Diamond v. Diehr</u>, 450 U.S. 175 (1981), and all claim limitations must be considered, <u>In re Wilson</u>, 424 F.2d 1382, 165 USPQ 494 (CCPA 1970).

Appellants assert that the final rejections of claims 9 and 30 are in error because the prior art references when combined do not teach or suggest "assessing the impact upon and determining the changes of the business component resulting from changes to the information technology component prior to implementation of the changes in the information technology architecture; and assessing the impact upon and determining the changes of the information technology component resulting from changes to the business component prior to implementation of the changes in the business architecture," as required by independent claim 9. Nor does the combination of Myrick '427 with Huang '582 teach or suggest "a linkage assessment tool to evaluate the operational linkages between the [business and information technology] components integrated in the database, the linkage assessment tool to assess the impact of changes to one of the [business or information technology] components integrated in the database resulting from changes on at least one other component [information technology or business] integrated in the database and output an impact assessment work product", as required by claim 30. Because neither reference teaches the claimed limitations, their combination cannot do so.

B. Summary

Appellants request the Board of Patent Appeals and Interferences reverse the final rejection of claims 1, 2, 4, 6, 9, 10, 13-23, 26, 27, 29 and 30 because the combination of references does not teach the claim limitations of assessing the impact of changing an IT section component on a business component in a computerized enterprise model and system. This long suffering application has endured ten different rejections based on nine different references over the past five years. Appellants pray for relief from the final rejection of the claims and for allowance of the patent.

Respectfully submitted,

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Dated: 25 October 2010

CLAIMS APPENDIX

1.   A computer system having a model of a business enterprise and its information

technology, comprising:

at least one computer processing unit;

      at least one memory operatively coupled to at least one computer processing unit;

      an integrated enterprise component comprising a business component as a digital

            representation of a business enterprise, the business component integrated and

            operationally linked with an information technology component as a digital

            representation of an information technology infrastructure of the business

            enterprise, the components stored in at least one computer memory and

            executable in at least one computer processing unit;

      the business component further comprising a plurality of business section components

            operationally integrated with at least one other business section component;

      the information technology component further comprising:

            at least one application software component to process at least business

                  information data from the business component, and

            a plurality of information technology section components operationally

                  integrated with at least one other information technology section

                  component;

a guiding component user interface operatively coupled to the integrated enterprise

component and configured to change one or more of the section components;

an assessment component operatively coupled to the guiding component and

configured to assess an impact on operations of others of the section

components resulting from changes in one section component; and

an impact assessment work product generator component operatively coupled to the

assessment component and configured to receive an assessment of the impact

and generate a work product of the assessment.

2.   The computer system of Claim 1, the integrated enterprise component further

comprising:

a governance component stored in at least one memory and executable in at least one

computer processing unit, the governance component comprising an enterprise management

component, at least one enterprise management process, and evaluation criteria by which to

evaluate the changes in others of the section components, and the assessment component.

4.   The computer system of Claim 2, the guiding component user interface further

comprising a software navigator to access at least the evaluation criteria, the assessment

component, and the impact assessment work product.

6.   The computer system of Claim 1, the enterprise component further comprising:

a strategic direction component;

a capabilities component; and

a principles component operationally integrated with at least one of the business component and the information technology component, and their respective section components, and stored in at least one memory and executable in at least one computer processing unit.

9.   A computerized method of integrating a business component as a digital representation of a business architecture of an integrated enterprise with an information technology component as a digital representation of the integrated enterprise's information technology architecture, the business component and the information technology component stored in at least one computer processing system, the method steps comprising:

integrating and coupling at least one operation between an enterprise directions component

stored in the computer processing system being a digital representation of the directions of the enterprise with the business component and the information technology component in the computer processing system;

integrating and coupling at least one operation between an enterprise capabilities component

stored in the computer processing system being a digital representation of the capabilities of the enterprise with the business component and the information technology component in the computer processing system;

integrating and coupling at least one operation between an enterprise principles component

    stored in the computer processing system being a digital representation of the

    principles of the enterprise with the business component and the information

    technology component in the computer processing system;

operationally coupling the enterprise directions component and the enterprise capabilities

    component;

integrating the business component as a plurality of business section components comprising

    a business information section component and a business processes section

    component and a business data section component;

operationally coupling the business processes section component and the enterprise

    capabilities component;

integrating the information technology component as at least application software and an

    information technology data section component;

operationally coupling the application software and the business processes section

    component and the enterprise principles component;

operationally coupling the information technology data section component and the business

    information section component;

assessing the impact upon and determining the changes of the business component resulting

    from changes to the information technology component prior to implementation of

    the changes in the information technology architecture;

assessing the impact upon and determining the changes of the information technology

component resulting from changes to the business component prior to implementation

of the changes in the business architecture;

outputting an impact assessment work product of the impact on and changes in each

respective component.

10.   The computerized method of Claim 9 further comprising:

providing a front-end navigator executing in at least one computer processing system to

access the business data section component and the information technology data

section component stored in a computer memory;

operationally coupling the business data section component and the information technology

data section component with one or more business section components and with one

or more information technology components; and

enabling an individual to access the impact assessment work product.

13.   The computerized method of Claim 9 further comprising:

integrating a business structure section component in the business component;

integrating a business units section component in the business component;

integrating a business roles and responsibilities section component in the business

component;

integrating a business features and functions section component in the business

component;

integrating a business events section component in the business component;

providing at least one operational coupling among the business structure section

component, the business units section component, the business roles and

responsibilities section component, the business features and functions section

component, and the business events section component with the business

processes section component;

assessing the impact upon and determining the changes within the business

component resulting from changes in one or more of the business structure

section component, the business units section component, the business roles

and responsibilities section component, the business features and functions

section component, and the business event section component.

14.   The computerized method of Claim 9 further comprising:

integrating one or more reference information technology section components;

integrating a current information technology environment section component;

integrating an enterprise technology framework section component in the information

technology component;

providing at least one operational coupling among the one or more reference

information technology section components and the current information

technology environment section component and the enterprise technology

framework section component and the application software;

assessing the impact of changes and determining the changes within the information

technology component resulting from changes in the one or more reference

information technology section components and the current information

technology environment section component and the enterprise technology

framework section component and the application software.

15.   The computerized method of Claim 9 further comprising:

customizing the one or more of the reference information technology section

components to apply to a particular instance.

16.   The computerized method of Claim 15 further comprising:

customizing the one or more of the reference information technology section

components to apply to a particular industry.

17.   The computerized method of Claim 15 further comprising:

customizing the one or more of the reference information technology section

components to apply to a particular enterprise.

18.   The computer system of Claim 6, the integrated enterprise component comprising:

an organization component, the organization component further comprising a digital

representation of a business structure section component operationally

integrated with an information technology structure section component;

the business component further comprising a business roles and responsibilities

section component having digital representations of at least one reference to

one or more members of the business operationally integrated with digital

representations of an inventory of skills, education and training stored in a

computer memory of the one or more members of the business;

a policies and practices section component operationally integrated with at least one

business component.

19.   The computer system of Claim 6, the integrated enterprise component further

comprising:

a business/information technology alignment component operationally integrated

providing one or more relationships with at least one of the strategic direction

component and the capabilities component,

and the principles component in an operational coupling with the business component

and the information technology component.

21.   The computer system of Claim 19, the integrated enterprise component further

comprising:

a plans component having digital representations of business plans, information

technology plans, a listing of projects, transitions, and organization and change

plans of the business enterprise, the plans component operationally linked with

at least one information technology component and at least one business

component.

22.   The computer system of Claim 21, the integrated enterprise component further

comprising:

a user groups component having a digital representation of at least one user group that

uses the business enterprise operationally integrated with at least one of the

information technology component and the business component.

23.   The computer system of Claim 22, the integrated enterprise component further

comprising:

a products section having a digital representation of products of the business, the

products section operationally integrated with at least one of the principles

component, the products section component, and a standards component.

26.   The computer system of Claim 23, the business component further comprising a business information component having digital representations of:

at least one business area;

at least one business unit section component;

at least one business unit plan section component;

at least one business location section component having digital representations of processes, activities, and needs of least one business location;

wherein the business information components are operationally integrated with each other and with a business process section component.

27.   The computer system of Claim 26, the information technology component further comprising a reference architecture section component having digital representations of reference architectures and model business plans operationally integrated with the enterprise technology framework section component.

29.   The computer system of Claim 27, the information technology component further comprising

a delivery environment section component;

a data storage system section component; and

a data implementation system section component operationally linked with each other and with the products section component.

30.   An enterprise system for modeling and integrating the operation of a business

enterprise and an information technology processing system, the enterprise system

implemented in a data processing system and comprising:

at least one computer processing unit;

at least one memory operatively coupled to and accessible by at least one computer

processing unit;

a database stored in at least one memory and accessible by at least one computer

processing unit;

a first business component portion operationally integrated in the database of the data

processing system, the first business component portion comprising a digital

representation of the business operations and objectives of the business

enterprise;

a second information technology component portion operationally integrated in the

database of the data processing system, the second information technology

component portion comprising a digital representation of the information

technology processing system and a digital representation of application

software to process business information which the business enterprise uses to

conduct its business;

a governance function component operationally integrated in the database of the data

processing system, the governance function component comprising a digital

representation of the objectives of the business enterprise system;

a navigator operatively coupled to the data processing system for using and modifying

the first business and the second information technology component portions;

a strategic direction, capabilities, and principles component operationally integrated

with the database of the data processing system;

an enterprise component operationally integrated in the database of the data

processing system, the enterprise component having a digital representation of

an enterprise structure of the business enterprise, an enterprise structure of the

information technology processing system, roles and responsibilities of

members of the business enterprise, inventory of skills, education and training

of members of the business enterprise, policies and practices of the business

enterprise, and enterprise structures;

a business information technology alignment component operationally integrated in

the database of the data processing system, the business information

technology alignment component having a digital representation of strategies

for business operations and the information technology processing system;

an enterprise component operationally integrated in the database of the data

processing system, the enterprise component having a digital representation of

capabilities of the business operations and the information technology

processing system;

a plans component operationally integrated in the database of the data processing

system, the plans component having a digital representation of business plans,

information technology plans, projects, transitions, and enterprise and change

plans;

a users groups component operationally integrated in the database of the data

processing system, the users group component comprising a digital

representation of at least one user group and how the at least one user group

affects the business enterprise;

a products component operationally integrated in the database and operationally

linked to an architectural building block component integrated in the database;

a standards component operationally integrated in the database and operationally

coupled to the architectural building block component;

a principles component operationally integrated in the database, the principles

component operationally coupled to an enterprise component integrated in the

database, the architectural building blocks component integrated in the

database, and a business information technology alignment component

integrated in the database, the principles component comprising a digital

representation of each of a plurality of principles applies and their respective

use in operations of the business enterprise and information technology

processing system;

a business component operationally integrated in the database, the business

component comprising a digital representation of business areas and units, unit

plans, business locations, processes and activities and needs of operations of

the business enterprise and information technology processing system;

a reference component operationally integrated in the database, the reference

component comprising reference components and models of reference

business plans customizable for the business enterprise and information

technology processing system; and

a business locations component operationally integrated in the database, the business

locations component comprising a list of business locations of the business

enterprise and information technology processing system;

a delivery environment component operationally integrated in the database to

application software, data storage systems, data implementation systems

within the business locations component, and to the products component and

the standards component, respectively,

a plurality of operational linkages among the components integrated in the database;

a linkage assessment tool to evaluate the operational linkages between the

components integrated in the database, the linkage assessment tool to assess

the impact of changes to one of the components integrated in the database

resulting from changes on at least one other component integrated in the

database and output an impact assessment work product.

EVIDENCE APPENDIX

[None]

RELATED PROCEEDINGS APPENDIX

[None]